

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN**

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GERALD F. BUSHMAKER,

Plaintiff,

v.

A. W. CHESTERTON COMPANY, *et al.*

Defendants.

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Case No. 3:09-cv-00726 SLC

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**DEFENDANT RAPID-AMERICAN CORPORATION'S PROPOSED LIMITING  
INSTRUCTION REGARDING TESTIMONY OF ARTHUR MUELLER**

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Pursuant to the Court's Order granting Defendant Rapid-American Corporation's Motion in Limine #23, this defendant requests that the Court give the following limiting instruction regarding the testimony of Arthur Mueller:

Ladies and gentlemen of the jury, during the course of the trial evidence was received in the form of deposition testimony of Arthur Mueller which was read to you by the parties. That evidence has been received by the Court and may be considered by you but only for a limited purpose. You are instructed that the testimony of Mr. Mueller may only be considered by you in making your determination as to whether or not products manufactured by The Philip Carey Manufacturing Company were defective. It may not be used by you to find that The Philip Carey Manufacturing Company was in any way at fault for failing to give warnings about its products after these products were sold. This case does not include any claim that The Philip Carey Manufacturing Company was at fault for failing to give warnings about its products after those products left its possession and were sold to others.

Respectfully submitted this 7<sup>th</sup> day of March, 2013.

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